

## REMARKS

Claims 1-47 are pending and stand as rejected. Claim 36 is amended to correct a typographical error.

### Claim Rejections – §103

Claims 1, 2, 6, 10-11, 17-18, 21, 22, 26-27, 29-31, 36, 38-39, and 43-44 stand rejected under 35 U.S.C. §103 based on U.S. Patent No. 6,263,341 issued to Smiley (“Smiley”) in view of “Index Interface Links CASE and IBM’s DB2,” by Feuche (“Feuche”).

The examiner states that “Feuche clearly teaches an automated process.” Claim 1 does not recite “an automated process.” Claim 1 recites a computer that generates tables from definitions that define “a set of relationships between tables and programs that operate on the set of tables and the set of table columns.”

The examiner states that “It is obvious that the logical definitions used by the computer has to contain relationships between the tables and operations defining programs that operate on the tables, otherwise a true database like DB2 will not be built successfully.” Applicants submit that the examiner is creating characteristics that are not disclosed by the reference. The Feuche reference states that a link creates DB2 entities from logical record definitions found in Excelerator. The Excelerator XL Dictionary “includes column, table, view, index, table space, storage group and database.” However, the link and the definitions disclosed in Feuche neither disclose nor suggest a computer that generates tables from definitions that define “a set of relationships between tables and programs that operate on the set of tables and the set of table columns,” as recited in claim 1. Therefore, the Assignee submits that the Feuche reference neither discloses nor suggests a computer that generates tables from definitions that define “a set of relationships between tables and programs that operate on the set of tables and the set of table columns,” as recited in claim 1.

The examiner states that the Feuche reference “really is a tool to *help you build* DB2 databases. . . .” (Emphasis added). The Assignee submits that the Feuche reference still requires work on the part of the user. Because the Feuche reference fails to have the computer use a definition that defines “a set of relationships between tables and programs that operate on the set

of tables and the set of table columns" to generate the tables, Feuche suffers from the same deficiency as Smiley. Feuche simply neither discloses nor suggests a computer that generates tables from definitions that define "a set of relationships between tables and programs that operate on the set of tables and the set of table columns," as recited in claim 1.

The examiner states that the Feuche reference "does not explicitly teach that the logical definitions, based on which DB2 tables are automatically created, contain definitions that define relationships between tables and programs that operate on the set of tables, the Smiley reference does teach these definitions as stated above."

In Smiley, the relationships between tables and programs that operate on the set of tables are generated the old fashioned way, by a human programmer writing code by hand. Clearly, Smiley does not disclose "the computer using the definition to generate the set of tables" from a definition that defines "a set of relationships between the tables of the set of tables," and "programs that operate on the set of tables and the set of table columns," as recited in claim 1.

Smiley's system and Feuche's system, even when combined, neither teach nor suggest a computer that generates tables from definitions that define "a set of relationships between tables and programs that operate on the set of tables and the set of table columns," as recited in claim 1. The Assignee submits that claim 1 is patentable over Smiley in view of Feuche.

Given that claims 2, 6, 10-11 and 17-18 depend from claim 1, the Assignee submits that these claims are also patentable over Smiley in view of Feuche.

Claim 21 recites "the first program further for using the definition to generate the set of tables." Smiley and Feuche, alone or in combination, neither disclose nor suggest "the computer using the definition to generate the set of tables" from a definition that defines "a set of relationships between the tables of the set of tables," and that defines "programs that operate on the set of tables and the set of table columns," as recited in claim 1. Therefore, the Assignee submits that claim 21 is patentable over Smiley in view of Feuche. Given that claims 22, 26-27 and 29 depend from claim 21, the Assignee submits that these claims are also patentable over Smiley.

Claim 30 recites “means for using the definition to generate the set of tables.” Smiley and Feuche, alone or in combination, neither disclose nor suggest “means for using the definition to generate the set of tables.” Therefore, the Assignee submits that claim 30 is patentable over Smiley in view of Feuche. Given that claims 31 and 36 depend from claim 30, the Assignee submits that these claims are also patentable over Smiley in view of Feuche.

Claims 38 and 43 recite “instructions for using the definition to generate the set of tables.” Smiley and Feuche, alone or in combination, neither disclose nor suggest “instructions for using the definition to generate the set of tables.” Therefore, the Assignee submits that claims 38 and 43 are patentable over Smiley in view of Feuche. Given that claim 39 depends from claim 38, the Assignee submits that this claim is also patentable over Smiley in view of Feuche. Given that claim 44 depends from claim 43, the Assignee submits that this claim is patentable over Smiley in view of Feuche.

### **Claim Rejections – §103**

Claims 3, 5, 23, 25, 32, 34, 40, 42, 45 and 47 stand rejected under 35 U.S.C. 103 based on Smiley in view Feuche and further in view of U.S. Patent No. 5,295,256 issued to Bapat (“Bapat”).

As discussed above, Smiley and Feuche, alone or in combination, neither disclose nor suggest “the computer using the definition to generate the set of tables.”

The Office action states that “Bapat teaches generating a foreign key column.” As the Examiner implicitly concedes, however, that Bapat does not disclose “the computer using the definition to generate the set of tables.”

As a result, even if Smiley, Feuche, and Bapat were combined, the combination would neither teach nor suggest “the computer using the definition to generate the set of tables,” as recited in claim 1. Therefore, the Assignee submits that claim 1 is patentable over Smiley in view of Feuche and Bapat. Given that claims 3 and 5 depend from claim 1, the Assignee submits that these claims are also patentable over Smiley in view of Feuche and Bapat.

Claim 21 recites “the first program further for using the definition to generate the set of tables.” Smiley, Feuche, and Bapat, alone or in combination, neither teach nor suggest “the first program further for using the definition to generate the set of tables.” Therefore, the Assignee submits that claim 21 is patentable over Smiley in view of Feuche and Bapat. Given that claims 23 and 25 depend from claim 21, the Assignee submits that these claims are also patentable over Smiley in view of Feuche and Bapat.

Claim 30 recites “means for using the definition to generate the set of tables.” Smiley, Feuche, and Bapat, alone or in combination, neither teach nor suggest “means for using the definition to generate the set of tables.” Therefore, the Assignee submits that claim 30 is patentable over Smiley in view of Feuche and Bapat. Given that claims 32 and 34 depend from claim 30, the Assignee submits that these claims are patentable over Smiley in view of Feuche and Bapat.

Claims 38 and 43 recite “instructions for using the definition to generate the set of tables.” Smiley, Feuche, and Bapat, alone or in combination, neither teach nor suggest “instructions for using the definition to generate the set of tables.” Therefore, the Assignee submits that claims 38 and 43 are patentable over Smiley in view of Feuche and Bapat. Given that claims 40 and 42 depend from claim 38, the Assignee submits that these claims are patentable over Smiley in view of Feuche and Bapat. Given that claims 45 and 47 depend from claim 43, the Assignee submits that these claims are patentable over Smiley in view of Feuche and Bapat.

Claims 4, 7, 24, 33, 41 and 46 stand rejected under Smiley in view of Feuche and further in view of U.S. Patent No. 5,249,300 issued to Bachman et al. (“Bachman”).

As discussed above, Smiley and Feuche, alone or in combination, neither disclose nor suggest “the computer using the definition to generate the set of tables.”

The Office action states that “Bachman teaches ... many to many relationship.” The Examiner implicitly concedes, however, that Bachman does not disclose “the computer using the definition to generate the set of tables.”

As a result, even if Smiley, Feuche, and Bachman were combined, the combination would neither teach nor suggest “the computer using the definition to generate the set of tables,” as recited in claim 1. Therefore, the Assignee submits that claim 1 is patentable over Smiley in view of Feuche and Bachman. Given that claims 4 and 7 depend from claim 1, the Assignee submits that these claims are also patentable over Smiley in view of Feuche and Bachman.

Claim 21 recites “the first program further for using the definition to generate the set of tables.” Smiley, Feuche, and Bachman, alone or in combination, neither teach nor suggest “the first program further for using the definition to generate the set of tables.” Therefore, the Assignee submits that claim 21 is patentable over Smiley in view of Feuche and Bachman. Given that claim 24 depends from claim 21, the Assignee submits that this claim is also patentable over Smiley in view of Feuche and Bachman.

Claim 30 recites “means for using the definition to generate the set of tables.” Smiley, Feuche, and Bachman, alone or in combination, neither teach nor suggest “means for using the definition to generate the set of tables.” Therefore, the Assignee submits that claim 30 is patentable over Smiley in view of Feuche and Bachman. Given that claim 33 depends from claim 30, the Assignee submits that this claim is patentable over Smiley in view of Feuche and Bachman.

Claims 38 and 43 recite “instructions for using the definition to generate the set of tables.” Smiley, Feuche, and Bachman, alone or in combination, neither teach nor suggest “instructions for using the definition to generate the set of tables.” Therefore, the Assignee submits that claims 38 and 43 are patentable over Smiley in view of Feuche and Bachman. Given that claim 41 depends from claim 38, the Assignee submits that this claim is patentable over Smiley in view of Feuche and Bachman. Given that claims 46 depends from claim 43, the Assignee submits that this claim is patentable over Smiley in view of Feuche and Bachman.

Claim 8 stands rejected under 35 U.S.C. 103 based on Smiley in view of Feuche and further in view of U.S. Patent No. 6,263,341 issued to Skinner et al. (“Skinner”).

As discussed above, Smiley and Feuche, alone or in combination, neither disclose nor suggest “the computer using the definition to generate the set of tables.”

The Office action states that “Skinner teaches a date column.” The Examiner implicitly concedes, however, that Skinner does not disclose “the computer using the definition to generate the set of tables.”

As a result, even if Smiley, Feuche, and Skinner were combined, the combination would neither teach nor suggest “the computer using the definition to generate the set of tables,” as recited in claim 1. Therefore, the Assignee submits that claim 1 is patentable over Smiley in view of Feuche and Skinner. Given that claim 8 depends from claim 1, the Assignee submits that these claims are also patentable over Smiley in view of Feuche and Skinner.

Claim 9 stands rejected under 35 U.S.C. 103 based on Smiley in view of Feuche and further in view of U.S. Patent No. 6,167,405 issued to Rosensteel (“Rosensteel”).

As discussed above, Smiley and Feuche, alone or in combination, neither disclose nor suggest “the computer using the definition to generate the set of tables.”

The Office action states that “Rosensteel teaches a source system key column.” The Examiner implicitly concedes, however, that Rosensteel does not disclose “the computer using the definition to generate the set of tables.”

As a result, even if Smiley, Feuche, and Rosensteel were combined, the combination would neither teach nor suggest “the computer using the definition to generate the set of tables,” as recited in claim 1. Therefore, the Assignee submits that claim 1 is patentable over Smiley in view of Feuche and Rosensteel. Given that claim 9 depends from claim 1, the Assignee submits that these claims are also patentable over Smiley in view of Feuche and Rosensteel.

Claims 12-16, 19 and 28 stand rejected under 35 U.S.C. 103 based on Smiley in view of Feuche and further in view of U.S. Patent No. 5,272,628 issued to Koss (“Koss”).

As discussed above, Smiley and Feuche, alone or in combination, neither disclose nor suggest “the computer using the definition to generate the set of tables.”

The Office action states that "Koss teaches a method comprising...creating a set of aggregate tables." The Examiner implicitly concedes, however, that Koss does not disclose "the computer using the definition to generate the set of tables."

As a result, even if Smiley, Feuche and Koss were combined, the combination would neither teach nor suggest "the computer using the definition to generate the set of tables," as recited in claim 1. Therefore, the Assignee submits that claim 1 is patentable over Smiley in view of Feuche and Koss. Given that claims 12-16 and 19 depend from claim 1, the Assignee submits that these claims are also patentable over Smiley in view of Feuche and Koss.

Claim 21 recites "the first program further for using the definition to generate the set of tables." Smiley, Feuche, and Koss, alone or in combination, neither teach nor suggest "the first program further for using the definition to generate the set of tables." Therefore, the Assignee submits that claim 21 is patentable over Smiley in view of Feuche and Koss. Given that claim 28 depends from claim 21, the Assignee submits that this claim is also patentable over Smiley in view of Feuche and Koss.

Claim 20 stands rejected under 35 U.S.C. 103 based on Smiley in view Feuche and further in view of U.S. Patent No. 6,282,544 issued to Tse et al. ("Tse").

As discussed above, Smiley and Feuche, alone or in combination, neither disclose nor suggest "the computer using the definition to generate the set of tables."

The Office action states that "Tse teaches a datamart." The Examiner implicitly concedes, however, that Tse does not disclose "the computer using the definition to generate the set of tables."

As a result, even if Smiley, Feuche, and Tse were combined, the combination would neither teach nor suggest "the computer using the definition to generate the set of tables," as recited in claim 1. Therefore, the Assignee submits that claim 1 is patentable over Smiley in view of Feuche and Tse. Given that claim 20 depends from claim 1, the Assignee submits that this claim is also patentable over Smiley in view of Feuche and Tse.

Claim 35 stands rejected under 35 U.S.C. 103 based on Smiley in view of Feuche and further in view of Bapat and Koss.

Claim 30 recites "means for using the definition to generate the set of tables." Smiley, Feuche, Bapat, and Koss, alone or in combination, neither teach nor suggest "means for using the definition to generate the set of tables." Therefore, the Assignee submits that claim 30 is patentable over Smiley in view of Feuche, Bapat, and Koss. Given that claim 35 depends from claim 30, the Assignee submits that this claim is patentable over Smiley in view of Feuche, Bapat, and Koss.

Claim 37 stands rejected under 35 U.S.C. 103 based on Smiley in view of Feuche and further in view of Koss and Bachman.

Claim 30 recites "means for using the definition to generate the set of tables." Smiley, Feuche, Koss, and Bachman, alone or in combination, neither teach nor suggest "means for using the definition to generate the set of tables." Therefore, the Assignee submits that claim 30 is patentable over Smiley in view of Feuche, Koss, and further in view of Bachman. Given that claim 37 depends from claim 30, the Assignee submits that this claim is patentable over Smiley in view of Feuche, Koss, and Bachman.

### Conclusion

Reconsideration and allowance of all pending claims are respectfully requested. The Examiner may call the Assignee's attorney at (650) 849-4422 to further advance prosecution of this case to issuance.

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Respectfully submitted,

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